

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

FILED

NOV 21 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

TYKESE LOFTON and
ERRICK ROACH,

Defendants.

Cause No.

4:19CR966 SRC/SPM

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about October 6, 2019, in St. Louis County, within the Eastern District of Missouri,

**TYKESE LOFTON and
ERRICK ROACH,**

the Defendants herein, with intent to cause death and serious bodily harm, did take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2002 Toyota Camry, Vehicle Identification Number ("VIN") 4T1BF32KX2U501802, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(1).

COUNT TWO

The Grand Jury further charges that:

On or about October 6, 2019, in St. Louis County, within the Eastern District of Missouri,

**TYKESE LOFTON and
ERRICK ROACH,**

the Defendants herein, knowingly possessed and brandished a firearm, in furtherance of a crime of violence which may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count One.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

The Grand Jury further charges that:

On or about October 8, 2019, in St. Louis City, within the Eastern District of Missouri,

**TYKESE LOFTON and
ERRICK ROACH,**

the Defendants herein, with intent to cause death and serious bodily harm, did take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2016 Kia Optima, Vehicle Identification Number ("VIN") KNAGT4L37G5116373, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(1).

COUNT FOUR

The Grand Jury further charges that:

On or about October 8, 2019, in St. Louis City, within the Eastern District of Missouri,

**TYKESE LOFTON and
ERRICK ROACH,**

the Defendants herein, knowingly possessed and brandished a firearm, in furtherance of a crime

of violence which may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count Three.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FIVE

The Grand Jury further charges that:

On or about October 13, 2019, in St. Louis City, within the Eastern District of Missouri,

TYKESE LOFTON,

the Defendant herein, together with another, with intent to cause death and serious bodily harm, did take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2012 Audi Q7, Vehicle Identification Number ("VIN") WA1LMAFE6CD007794, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(1).

COUNT SIX

The Grand Jury further charges that:

On or about October 13, 2019, in St. Louis City, within the Eastern District of Missouri,

TYKESE LOFTON,

the Defendant herein, together with another, knowingly possessed and brandished a firearm, in furtherance of a crime of violence which may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count Five.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT SEVEN

The Grand Jury further charges that:

On or about October 15, 2019, in St. Louis County, within the Eastern District of Missouri,

ERRICK ROACH,

the Defendant herein, together with another, with intent to cause death and serious bodily harm, did take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2017 Chevrolet Impala, Vehicle Identification Number ("VIN") G1145S33H9181893, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(1).

COUNT EIGHT

The Grand Jury further charges that:

On or about October 15, 2019, in St. Louis County, within the Eastern District of Missouri,

ERRICK ROACH,

the Defendant herein, together with another, knowingly possessed and brandished a firearm, in furtherance of a crime of violence which may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count Seven.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

A TRUE BILL

FOREPERSON

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